

Question #6 – Response to Request #8

In response to your request for clarification in reference to Question #6a and #6b, Request #8, Hickman's Family Farms (HFF) has attached the revised Hydrogen Sulfide and Ammonia sampling locations for the Arlington and Tonopah (Doc #212 and #213) for Question #2d. These attachments illustrate our sampling revised sampling locations which are performed on a monthly basis for Hydrogen Sulfide and Ammonia. As stated previously, in lieu of the above reactionary hydrogen sulfide testing schedule, HFF has proactively and voluntarily monitored Hydrogen Sulfide and Ammonia on a monthly basis at both the Arlington and Tonopah facilities.

As stated previously, HFF conducts monthly EPA Method 22 visible air quality checks on the rotary dryer system to ensure compliance as required to evaluate opacity to comply with any potential fugitive dust emissions from the Fertilizer Plant process.

As previously discussed with your office, the rotary dryer was installed at the Arlington Facility in September of 2015. In 2015, the rotary dryer was only used on 4 occasions, based upon mechanical and operational failures, as well as personnel training on the operation and maintenance of the system.

<u>Days of operation 2015</u>		<u>Calculations:</u>
09/29/15	4 hours	$4+5+4+4 = 17 \text{ Hours} / 4 \text{ Days in Operation} = 4.25 \text{ hours / day}$
10/23/15	5 hours	
12/01/15	4 hours	
12/04/15	4 hours	

Beginning in 2016, based upon excessive the moisture content of the product, additional mechanical and operational problems prevented the full operation and capacity of the rotary dryer. In August of 2016, based upon a change in management at the facility, as well as comprehensive mechanical and operational improvements to the system, HFF notified the Arizona Department of Environmental Quality – Air Quality Division (ADEQ) of full operational capabilities, and scheduled an announced inspection of the system in early September.

Based upon excessive monsoon rain activity, the ADEQ postponed the inspection until September 20, 2016 – to allow the moisture content of the compost to equalize prior to observing the process. Unfortunately, the product was simply way too moist to successfully run through the system and accomplish the required parameters for our customers. Therefore, the inspection was re-scheduled for October 4, 2016.

On October 4, 2016, ADEQ observed the rotary dryer in operation and produced an inspection report (Titled: Hickman's Farmers Choice Insp 10.4.16 Updated) which has been included with this response. At the time of the inspection, HFF personnel provided ADEQ copies of all required documentation, including monthly monitoring measurements from the rotary dryer covered under the recent Arizona Agricultural Best Management Practices Permit. Copies of the measurements provided to ADEQ are written below.

Date	Start Time	End Time	Duration	Emission Visible?	Location	By Who:
9/12/2016	9:45 AM			Yes, called Rick Teal	Top of Stairs	K.W/R.P
9/21/2016	12:35 PM			No , white cloud of steam	Fert. Office	K.W
9/28/2016	2:45 PM			No , white cloud of steam	Fert. Office	K.W

Based upon the guidance of the ADEQ representatives during the inspection, HFF is revising the Method 22 log sheet to reflect the required information outlined in the EPA Guidance document provided within ADEQ's inspection report. A copy of the template that HFF will implement as of October 2016 has been included with the response as an attachment (Titled: Fugitive Emission Inspection – Outdoor Location).